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*ADMITTED IN NJ AND PENDING ADMISSION IN NY

VIA ECF

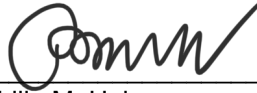
The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application granted.

Defendant Taveras Abreu is permitted to travel to the Monroe County Courthouse, located at 610 Monroe Street in Stroudsburg, PA, on March 31, 2023 for his 8:30 a.m. court appearance.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 122.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 20, 2023

**Re: *United States v. Julio Alberto Taveras Abreu*
23 Cr. 64 (PMH)**

Dear Judge Halpern:

Please recall that Peter Frankel, Esq., and I represent Mr. Julio Alberto Taveras Abreu in the above-referenced matter. For the reasons that follow, I write to respectfully request that Your Honor permit Mr. Taveras Abreu to travel to the Commonwealth of Pennsylvania on Friday, March 31, 2023 for a court appearance in a pending criminal prosecution against him in the Monroe County Court of Common Pleas. I have consulted with A.U.S.A. Kevin Sullivan and United States Pretrial Services Officer Laura Gialanella, both of whom have no objection to this request.

Currently, Mr. Taveras Abreu is at liberty on a \$100,000 personal recognizance bond set before the Magistrate Judge Judith C. McCarthy on December 2, 2021. The terms of the bond are as follows: travel restricted to the Southern and Eastern Districts of New York and, upon application to the Court, to Pennsylvania for court appearances; the surrender of all travel documents to Pretrial Services and no new applications; supervision as directed by Pretrial Services; and GPS monitoring and home detention. On March 4, 2022, Magistrate Judge Paul E. Davidson modified Mr. Taveras Abreu's bail conditions to permit him to attend religious services at Iglesia Casa de Jehova in White Plains, New York, and to permit him to travel to our Manhattan office when necessary without needing to obtain pre-approval from Pretrial Services. On April 1, 2022, Judge McCarthy modified Mr. Taveras Abreu's bail conditions to permit him to obtain employment. In addition, Judge McCarthy granted Mr. Taveras Abreu permission to travel to the Monroe County Court of Common Pleas on several occasions in 2022, and Mr. Taveras Abreu completed all trips without issue. Finally, on February 23, 2023, Your Honor ordered that Mr. Taveras Abreu's bail conditions be continued as set.

Mr. Taveras Abreu has a criminal case pending in the Commonwealth of Pennsylvania. On December 27, 2022, Judge Jonathan Mark of the Monroe County Court of Common Pleas

Cohen, Frankel & Ruggiero, LLP

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issued an Order scheduling a Final Call of the List for March 31, 2023 at 8:30 a.m.¹ If granted the requested modification, Mr. Taveras Abreu would travel to the Monroe County Courthouse, located at 610 Monroe Street in Stroudsburg, Pennsylvania, on March 31, 2023 for his 8:30 a.m. court appearance. Mr. Taveras Abreu would then promptly return to his home. Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Kevin Sullivan (via ECF)

U.S.P.T.S.O. Laura Gialanella (via ECF)

Mr. Julio Alberto Taveras Abreu (via email)

¹ The December 27, 2022 Order is attached hereto.